

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

MAJESTIC HILLS, LLC,
Debtor.

Case No. 20-21595-GLT

Chapter 11

MAJESTIC HILLS, LLC,
Movant,

Related to Doc. Nos. 10 and 12

v.

Hearing Date and Time:
June 18, 2020 at 10:00 a.m.

MUTUAL BENEFIT INSURANCE
COMPANY and WESTFIELD
INSURANCE COMPANY,
Respondents.

**MOTION TO EXTEND TIME TO RESPOND TO DEBTOR'S MOTIONS FOR ORDERS
(I) APPROVING THE ASSUMPTION OF THE SETTLEMENT AGREEMENTS AND
RELEASES BETWEEN THE DEBTOR AND MUTUAL BENEFIT INSURANCE
COMPANY AND WESTFIELD INSURANCE COMPANY, (II) APPROVING THE SALE
OF CERTAIN INSURANCE POLICIES, AND (III) ISSUING AN INJUNCTION
PURSUANT TO THE SALE OF CERTAIN INSURANCE POLICIES**

AND NOW comes The Gateway Engineers, Inc. ("Gateway"), by and through its counsel, Thomas H. Ayoob, III, Esquire, Matthew Junker, Esquire, and Thomas H. Ayoob III & Associates, LLC and files the following Motion To Extend Time To Respond To Debtor's Motions For Orders (I) Approving The Assumption Of The Settlement Agreements And Releases Between The Debtor And Mutual Benefit Insurance Company And Westfield Insurance Company, (II) Approving The Sale Of Certain Insurance Policies, And (III) Issuing An Injunction Pursuant To The Sale Of Certain Insurance Policies (the "Motion") as follows:

1. On May 21, the Debtor initiated this case by filing a Voluntary Petition for Relief under Chapter 11 of the Bankruptcy Code.

2. On the same day this case was filed, Debtor filed the following two motions: (1) Motion for an Order (I) Approving the Assumption of the Settlement Agreement and Release Between the Debtor and Mutual Benefit Insurance Company, (II) Approving the Sale of Certain

Insurance Policies, and (III) Issuing an Injunction Pursuant to the Sale of Certain Insurance Policies; and (2) Motion for an Order (I) Approving the Assumption of the Settlement Agreement and Release Between the Debtor and Westfield Insurance Company, (II) Approving the Sale of Certain Insurance Policies, and (III) Issuing an Injunction Pursuant to the Sale of Certain Insurance Policies (collectively the “Motions”).

3. Responses to the Motions were due on June 8, 2020.

4. Gateway does not intend to file its own additional objections to the Motions, but it would like to file a joinder to certain of the objections that were filed on or before the deadline to Respond to the Motion.

5. Gateway’s proposed Joinder is attached hereto as **Exhibit A**.

6. Gateway respectfully requests an extension of time until June 15, 2020 to file the attached Joinder.

7. No party will be prejudiced by the relief requested herein.

WHEREFORE, Gateway respectfully requests that this Honorable Court enter the attached order providing Gateway with an extension of time until June 15, 2020 to file the Joinder which is attached to this Motion as Exhibit A in response to the Debtor’s Motions.

THOMAS H. AYOOB III & ASSOCIATES, LLC

By: /s/ Matthew Junker
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